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Electronically (via ECF)

The Honorable Glenn T. Suddaby, USDJ
U.S. District Court, Northern District of New York
Federal Building and U.S. Courthouse
P.O. Box 7367
Syracuse, NY 13261

Re: *April Chandler. v. Mark Skipper aka Skip Archimedes, et al.*, 24-CV-206 (GTS)(ML)

Dear Judge Suddaby:

The undersigned represents defendants Vanguard Management Team, Inc. (“Vanguard”), David Guc (“Guc”), and Thomas Harrison (“Harrison”) (collectively, “Vanguard Defendants”) in this matter.

In response to the Court’s Text Order dated December 30, 2024, requesting the parties’ respective positions on the scope of a potential stay of the case, the Vanguard Defendants respectfully state that they agree with the position of the Maloy Defendants ([ECF 139](#)) in that judicial economy is best be served by the Court ruling on the pending motions to dismiss before addressing the application of the bankruptcy stay as a result of Mr. Harrison’s bankruptcy to the claims against the other defendants. Indeed, once the Court determines which, if any, discrete causes of action survive the pending motions, and against whom, then the Vanguard Defendants will be better positioned to provide the Court an informed opinion on the application of the stay to any claims that survive the motions to dismiss.

Respectfully submitted,

Leonard Lesser

Leonard Lesser, Esq.

cc: April Chandler (by mail)
All counsel of Record (by ECF)